

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

JAN - 4 2005

Michael N. Milby, Clerk

UNITED STATES OF AMERICA

v.

The Tollin Group, Inc.
dba, Remedy Intelligent
Staffing§
§
§
§
§
§
§
Criminal No. M-04-616NOTICE OF PLEA AGREEMENT

COMES NOW the United States of America, hereinafter referred to as "the Government," by and through its United States Attorney for the Southern District of Texas and its Assistant United States Attorney assigned to this matter, and would respectfully show the Court that the Government and the Defendant have entered into the following plea agreement:

1. The Defendant agrees to the following terms and conditions:
 - a. the Defendant agrees to plead guilty to the one-count Indictment,
 - b. the Defendant agrees to pay the maximum fine prescribed in the U.S. Sentencing Guidelines,
 - c. the Defendant agrees to the maximum amount of probation imposed by law,
 - d. the Defendant agrees to debarment by the Department of Defense ("DoD") for a period to be determined by DoD, and
 - e. the Defendant agrees to \$414,000.00 in penalties for violations of the Control of Employment of Aliens Act, 8 CFR Chapter 1, Subpart A – Employer Requirements § 274a.10.
2. The Government will recommend:
 - .

- a. that the Defendant receive maximum credit for acceptance of responsibility if in fact the defendant qualifies in accordance with the U.S. Sentencing guidelines;
- b. that the Government will bring no further charges against the Tollin Group, Inc., dba, Remedy Intelligent Staffing, or its owners arising out of facts which form the basis for the Indictment filed in this case.

This document states the complete and only Plea Agreement between the United States of America and the Defendant, and is binding only on the parties to this Agreement, and it supersedes all prior understandings, if any, whether written or oral, and cannot be modified other than in writing and signed by all parties or on the record in Court. No other promises or inducements have been or will be made to the Defendant in connection with this case, nor have any promises or threats been made in connection with this plea.

ACKNOWLEDGMENTS:

I have read this agreement and carefully reviewed every part of it with my attorney. If I have difficulty understanding the English language, I have had a person fluent in the Spanish language interpret this agreement to me.

Date: 12-21-04

Defendant: John Hockenfey

I am the Defendant's counsel. I have carefully reviewed every part of this agreement with the Defendant. I certify that this agreement has been translated to my client by a person fluent in the Spanish language if my client is unable to read or has difficulty understanding the English language.

Date: 12-21-04

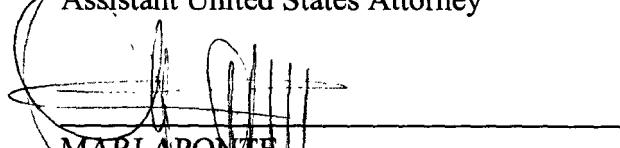

RON EDERER
Counsel for Defense

For the United States of America:

APPROVED BY:

MICHAEL T. SHELBY
United States Attorney


ABRA MARTINEZ
Assistant United States Attorney


MARI APONTE
Assistant United States Attorney